

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

ROBERT DAVID STEELE *et al.*,
Plaintiffs,

v.

JASON GOODMAN *et al.*,
Defendants.

Civil Action No. 3:17cv601

DECLARATION OF DEFENDANT PATRICIA A. NEGRON

- 1, Patricia Negron, make this declaration under 28 U.S.C. § 1746 of my own personal knowledge.
- I am a resident of Boston, Massachusetts.
 - I am the single mother and custodial parent of three boys, the youngest of whom is a senior in high school.
 - I was forced to quit working four years ago due to a crisis with one of my children, and I have not been employed full time since then.
4. The costs to defend myself in this case have depleted my savings and I was recently forced to sell my home. Until our lease expires in June, my youngest son and I reside in a small apartment.
5. I will be required to drive myself from Boston to Richmond to attend the Settlement Conference. I anticipate the trip could take me away from home and my son potentially for two nights and three days.
6. Our apartment is too far from my son's school for him to walk or ride a bike, and he is unable to take the bus. I am not able to rely on family or friends to stay with my son while I come to Virginia. My son does not drive, and has never taken a taxi, Uber, Lyft or other form of public transportation by himself, nor stayed home alone for a multiple days.
7. In summary, traveling to Virginia the week of March 16 would be burdensome on me and my family.

I hereby declare that the foregoing is true and correct under penalty of perjury, this 26th day of February 2020, NEEDHAM, Massachusetts.

